

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Implementation of Section 621(a)(1) of the Cable) MB Docket No. 05-311
Communications Policy Act of 1984 as Amended)
by the Cable Television Consumer Protection and)
Competition Act of 1992)

COMMENTS OF BREMERTON-KITSAP ACCESS TELEVISION

BREMERTON-KITSAP ACCESS TELEVISION appreciates the opportunity to file comments on the Second Further Notice of Proposed Rulemaking ("FNPRM") in the above-referenced docket.

We strongly oppose the tentative conclusions in the FNPRM that cable-related in-kind contributions are franchise fees and that local governments have no authority regarding cable operators' use of the rights of way to provide non-cable services.

The City of Bremerton represents Bremerton-Kitsap Access Television, (BKAT Community Access) to provide PEG access in our community on Comcast and WAVE Broadband. The City is currently supported with a 3.5-percent franchise fee. The impact to our budget of reduced franchise fees would reduce the level of community access for our city. Depending on the definition of in-kind services to be charged to the franchise fee, the funding we rely on could be cut by nearly thirty-per-cent.

If the decision to charge in-kind services as part of the franchise fees, the we respectfully ask for two-year transition period.

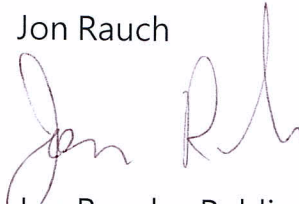
Public Access and Government access television is for the benefit of the whole community. Schools, non-profits, our City, and individuals produce local programming of local interest. Community Access is a pure support of freedom of speech. Open to all gender, race, age, opinions. Community Access is not the voice of the Cable company or City. Community Access is a true benefit for citizens for use of their Rights of Way.

We ask that the FCC not make any rule (s) that reduces current franchise fees or change rules to jeopardize local franchise authorities' abilities to protect its local citizens rights of way.

Thank you for your consideration of our concerns.

Respectfully submitted,

Jon Rauch

A handwritten signature in blue ink, appearing to read "Jon Rauch", with a stylized flourish at the end.

Jon Rauch - Public Access Manager

Bremerton-Kitsap Access Television

Bremerton, WA.

November 9, 2018